

OBJECTIVE(S):

- A. ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) – Maintain laboratory-wide ISO 14001 registration and continually improve the EMS.
- B. COMPLIANCE - Achieve full compliance with applicable environmental requirements.
 - Consistently meet all SPDES permit limits and comply with the Liquid Effluents subject area.
 - Article 12 Conformance.
 - Improve Resource Conservation and Recovery Act (RCRA) and Radiological Waste Compliance
 - Meet Federal and State Air Program Requirements including reducing the use of (and eventual phase out of) Ozone Depleting Substances (ODS).
 - Schedule and conduct regulatory compliance assessments to evaluate compliance to applicable regulations on a three-year cycle.
 - Participate in EPA Performance Track Program.
- C. POLLUTION PREVENTION - Integrate pollution prevention (P2) into work planning processes (facility design, experimental review, process assessment, work planning, etc.) and expand participation in the P2 program.
 - Reduce generation of hazardous, mixed, and low-level radioactive routine waste streams
 - Expand awareness and involvement in the BNL P2 Program. Evaluate and implement pollution prevention opportunities.
 - Reduce or prevent generation of non-routine waste, including spills
- D. COMMUNICATIONS - Improve communications, trust, and relationship with stakeholders on environmental programs.
- E. GROUNDWATER PROTECTION - Fully implement groundwater protection program. Protect groundwater quality from further chemical and radiological releases, and remediate existing contaminated groundwater.
- F. ENHANCE NATURAL AND CULTURAL RESOURCE MANAGEMENT PROGRAM - Ensure responsible stewardship of natural and historical resources onsite.

TARGET(S):

A. ENVIRONMENTAL MANAGEMENT SYSTEM (EMS):

- Review EMS audits, compliance assessments, and management reviews and communicate EMS improvement suggestions to the EMS manager by November 10, 2004 for use in Laboratory Management review.
- Submit EMS Audit Planning Form to EMS Manager by January 16, 2005 for use as an Internal Audit Planning tool.
- EMS Reps take the three EMS training courses, TQ-EMS-1, 2, 3.
- Policy Awareness: Provide at least 1 targeted EMS Awareness initiative at the supervisor and staff level at a tool box or pre-work meeting. Focus on how a specific task interacts with the environment and the employees responsibilities for that task. Include any consequences from departure from properly carrying out the assigned task.

B. COMPLIANCE:

- Obtain approval from Environmental and Waste Management Services Division (EWMSD) for 100% of discharges not specifically authorized by the Liquid Effluents subject area.
- Ensure conformance with the subject area, *Storage and Transfer of Hazardous and Nonhazardous Materials* by performing routine inspections specified in the subject area.
- Maintain all outdoor Article 12 registered tanks and storage areas with weather resistant labels and review these labels on quarterly Tier 1's.
- Review the list of Satellite Accumulation Areas (SAA's) and Radioactive Waste Accumulation Areas by February 27, 2005 and communicate any updated information to the Environmental & Waste Management Services Division (EWMSD) x7488.
- Set a goal of zero violations in SAA's and Radioactive Accumulation Areas. Track and trend all violations.
- Complete the waste generation forecast for FY06 and submit to EWMSD x8122 by June 30, 2005.
- Prepare plans to address the characterization and disposition of excess materials within each Directorate/Department by September 30, 2005.
- Close all RCRA findings from the FY04 RCRA Assessment. (ATS 1961)
- By December 31, 2004 and June 30, 2005 , involve Environmental Compliance Representatives (ECRs) in review of applicable Clean Air Act regulatory requirements for those emission units, processes, and emission sources

covered by BNL's Title V permit to ensure that compliance assurance documentation is consistent with recommendations offered in the Facility Use Agreement environmental database on the web at http://intranet.bnl.gov/esh/esd/FUA_Data.htm. Forward compliance assurance documentation to the SME by January 5 and July 5 to ensure timely submittal of annual and semi-annual compliance certifications to the NYSDEC and EPA.

- Conduct an inventory of Ozone Depleting Substances in your Department/Division and forward that inventory to the EWMSD CAA engineer (J. Williams) by June 1, 2005.
- Participate in the NEPA assessment scheduled for the first quarter FY05.
- Participate in the Environmental Monitoring assessment scheduled for the second quarter FY05.
- Participate in the planned assessment of Waste Characterization by fourth quarter FY05.
- Conduct an inventory of essential vs. non essential mercury by December 31, 2004
- Identify suitable replacements for mercury containing devices and prepare P2 funding requests to effect replacement and disposal of non-essential mercury.

C. POLLUTION PREVENTION:

- Set a Department wide goal on reducing a specific waste, track and report progress to line management on a quarterly basis.
- Analyze all waste generating activities for pollution prevention and track volume of wastes diverted and cost savings realized through P2 methods.
- Submit a minimum of two pollution prevention project proposals to the P2 Council by December 15, 2004.
- Submit a minimum of two success stories and/or lessons learned to the BNL P2 program manager by September 15, 2005.
- Develop a plan for the reduction of PCB containing devices by 12/15/05.

D. COMMUNICATIONS:

- Provide environmental updates to CAC & BER

E. GROUNDWATER PROTECTION:

- Zero impacts on groundwater quality from current operations. This will be measured by the number of confirmed impacts to groundwater quality resulting from current operations.

F. ENHANCE NATURAL AND CULTURAL RESOURCE MANAGEMENT PROGRAM:

- Support requirements for use of native vegetation where feasible in landscaping around buildings.